

EXHIBIT 3

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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This document relates to:

*Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 02 Civ. 6977
Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 03 Civ. 9849
Federal Insurance Co., et al. v. Al Qaida, et al., No. 03 Civ. 6978
Estate of John P. O'Neill, Sr., et al. v. Al Baraka., et al., No. 04 Civ. 1923
Continental Casualty Co., et al. v. Al Qaeda, et al., No. 04 Civ. 5970
Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd, et al., No. 04 Civ. 7065
Euro Brokers Inc., et al., v. Al Baraka, et al., No. 04 Civ. 7279
WTC Properties LLC, et al. v. Al Baraka, et al., No. 04 Civ. 7280*

**PLAINTIFFS' SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS
DIRECTED TO THE WORLD ASSEMBLY OF MUSLIM YOUTH – SAUDI ARABIA**

THE MDL 1570 PLAINTIFFS'
EXECUTIVE COMMITTEES
October 28, 2011

**PLAINTIFFS' SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS
DIRECTED TO THE WORLD ASSEMBLY OF MUSLIM YOUTH – SAUDI ARABIA**

Plaintiffs in *Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al.*, Case No. 02 Civ. 6977, *Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, Case No. 03 Civ. 9849, *Federal Insurance Co., et al. v. al Qaida, et al.*, Case No. 03 Civ. 6978, *Estate of John P. O'Neill, Sr., et al. v. Al Baraka, et al.*, Case No. 04 Civ. 1923, *Continental Casualty Co., et al. v. Al Qaeda, et al.*, Case No. 04 Civ. 5970, *Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd, et al.*, Case No. 04 Civ. 7065, *Euro Brokers Inc., et al. v. Al Baraka, et al.*, Case No. 04 Civ. 7279, and *WTC Properties LLC, et al. v. Al Baraka, et al.*, Case No. 04 Civ. 7280, propound and serve on World Assembly of Muslim Youth-Saudi Arabia (hereinafter “Defendant” or “WAMY”), the following Second Set of Requests for Production of Documents to be answered fully and under oath, pursuant to Rule 34 of the Federal Rules of Civil Procedure, within 30 days of their receipt.¹

The “Instructions” and “Definitions” set forth in the Plaintiffs’ First Set of Requests for Production of Documents Directed to the World Assembly of Muslim Youth-Saudi Arabia are incorporated herein by reference.

¹ Plaintiffs maintain that the World Assembly of Muslim Youth (“WAMY”), consisting of its headquarters in the Kingdom of Saudi Arabia and numerous branch offices throughout the world, is a single global organization. Counsel has appeared in these proceedings on behalf of WAMY’s headquarters in Saudi Arabia, as well as WAMY’s United States branch in Virginia (“WAMY International”), and has filed Motions to Dismiss on behalf of each. Because of these separate appearances, Plaintiffs have served, and continue to serve, discovery upon both “WAMY” and “WAMY International.” In doing so, Plaintiffs do not waive their argument that WAMY and all of its branch offices worldwide constitute a single organization.

**PLAINTIFFS' SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS
DIRECTED TO THE WORLD ASSEMBLY OF MUSLIM YOUTH – SAUDI ARABIA**

1. Please provide all annual, semi-annual, and other periodic financial reports of WAMY (including the branch offices), such as annual reports, balance sheets, financial statements, bank statements, bank account summaries, audits, etc.

ANSWER:

2. Please provide all lists of recipients of aid from the WAMY offices, to include lists which can be generated through any computer or electronic data storage systems.

ANSWER:

3. Please provide all documents relating to meetings of WAMY's General Secretariat or Board of Trustees, including without limitation, reports submitted by internal and external offices of WAMY, studies and research papers considered during such meetings, records relating to the activities of special committees of WAMY, transcripts or recordings of speeches and discussions during the meetings, resolutions and recommendations of the General Secretariat or Board of Trustees, agendas, etc.

ANSWER:

4. Please provide all annual or periodic reports concerning the objectives and activities of WAMY.

ANSWER:

5. Please provide all reports authored by delegations or groups sent by WAMY to assess conditions and needs in regions outside of Saudi Arabia.

ANSWER:

6. Please provide all reports submitted by the field offices of WAMY concerning their operations and finances.

ANSWER:

7. Please provide all summaries of disbursements by WAMY.

ANSWER:

8. Please provide all documents describing the organizational structure of WAMY, to include documents relating to the relationship between the various offices of WAMY.

ANSWER:

9. Please provide all protocols and/or other documents relating to the relationship between WAMY's offices in Saudi Arabia and the branch offices abroad, including without limitation, any protocols relating to the transfer of funds between the offices; any role of the Saudi offices in supervising the activities of the branches outside the Kingdom; any documents referring to reporting guidelines for the branch offices; and any documents relating to procedures governing the branch offices, the opening of bank offices and accounts, hiring and firing of employees, and the selection and approval of projects.

ANSWER:

10. Please provide all documents relating to the responsibilities of WAMY's Department of Overseas Offices.

ANSWER:

11. Please provide all lists or documents reflecting the identities of persons who were affiliated, as employees or volunteers, with WAMY's operations in Bosnia, the Philippines, Pakistan, Sudan, and/or Kashmir between 1991-2001.

ANSWER:

12. Please provide all documents relating to WAMY's relationship with Mammar Ameur (a/k/a Abu Shakeeb; a/k/a Shakib) (Guantanamo Bay detainee – ISN #939).

ANSWER:

13. Please provide all documents relating to WAMY's relationship with Adel Hassan Hamed (a/k/a Adel Hassan; a/k/a Hassan Adel Hussein; a/k/a Abu Dujani; a/k/a Hasan Hamd 'Abd al Muttalib; a/k/a Adel Hassen) (Guantanamo Bay detainee – ISN #940).

ANSWER:

14. Please provide all videotapes or texts of speeches given at youth camps run by WAMY.

ANSWER:

15. Please provide all documents relating to any meetings between WAMY officials and any officials of the Saudi government concerning religious extremism or terrorism.

ANSWER:

Dated: October 28, 2011

Respectfully submitted,

MDL 1570 Plaintiffs' Exec. Committee
THE MDL 1570 PLAINTIFFS'
EXECUTIVE COMMITTEES *PST.*

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Plaintiffs' Second Set of Requests for Production of Documents Directed to the World Assembly of Muslim Youth-Saudi Arabia was served via electronic mail this 28th day of October 2011, upon:

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(Defendants' Executive Committee's appointed representative to receive discovery requests and responses in 03-MDL-1570)



J. Scott Tarbutton, Esq.